

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

ELEANOR and ROCCO CIOFOLETTI
and LARRY STOSPAL, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

-VS-

SECURIAN FINANCIAL GROUP, INC.,
MINNESOTA LIFE INSURANCE
COMPANY, SHURWEST, LLC,
SECURIAN LIFE INSURANCE
COMPANY and MINNESOTA
MUTUAL COMPANIES, INC.,

Defendants.

Case No.: 0-18-cv-03025-JNE-ECW

**STIPULATION FOR STAY OF
THE ENTIRE CASE EXCEPT AS
TO CERTAIN DEPOSITIONS**

WHEREAS, on September 7, 2021, Defendants Securian Financial Group, Inc., Minnesota Life Insurance Company, Securian Life Insurance Company and Minnesota Mutual Companies, Inc. (together, “Securian”) filed a motion to stay this case due to a bankruptcy proceeding commenced by defendant Shurwest, LLC in the District of Arizona [Dkt. 266];

WHEREAS, on September 10, 2021, Plaintiffs filed a motion to compel depositions previously ordered by this Court;

WHEREAS, Securian and Plaintiffs have met and conferred and have stipulated to a stay of this case except that the following depositions shall be taken by October 1, 2021:

- Mike Clements on or before October 1, 2021
- Edie Jarvis on September 23, 2021 or before October 1, 2021
- Ruth Hallock before October 1, 2021
- John Helberg before October 1, 2021
- Securian and Plaintiffs will work to have third-party Louis Slagle's deposition completed before October 1, 2021.

NOW, THEREFORE, Securian and Plaintiffs respectfully request the Court grant the stipulation and order that the case is stayed, pending further guidance and/or rulings from the bankruptcy court in Arizona, except as to the foregoing depositions.

Respectfully submitted,

Date: September 14, 2021

By: s/Kathy J. Huang
Robert D. Phillips, Jr. (*pro hac vice*)
Kathy J. Huang (*pro hac vice*)
Gillian H. Clow (*pro hac vice*)
ALSTON & BIRD LLP
333 South Hope Street, 16th Floor
Los Angeles, CA 90071
Telephone: (213) 576-1000
Facsimile: (213) 576-1100
kathy.huang@alston.com
gillian.clow@alston.com

Shawn M. Raiter (#240424)
LARSON KING
30 East Seventh St., Ste. 2800
St. Paul, MN 55101
Tel: (651) 312-6500
Fax: (651) 312-6618
sraiter@larsonking.com

Attorneys for Defendants
Securian Financial Group, Inc., Minnesota
Life Insurance Company, Securian Life
Insurance Company, and Minnesota Mutual
Companies, Inc.

Date: September 14, 2021

By: s/ Amanda M. Williams
Daniel E. Gustafson (#202241)
Amanda M. Williams (#341691)
Daniel J. Nordin (#392393)
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
Tel: (612) 333-8844
dnordin@gustafsongluek.com
dgustafson@gustafsongluek.com
kgluek@gustafsongluek.com
awilliams@gustafsongluek.com

Lee Squitieri (pro hac vice)
SQUITIERI & FEARON, LLP
32 East 57th Street
12th Floor
New York, New York 10022
Tel: (212) 421-6492
lee@sfclasslaw.com

Attestation: I, Kathy J. Huang, hereby attest that I have received the consent of Amanda M. Williams to file this document and that she concurs with this document's contents.